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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:

DEREK LAYNE MILLS	§	CASE NO. 23-42530-13
	§	
Debtor,	§	CHAPTER 13
	§	
Tore and Darlene Wiksveen	§	
Movant,	§	
	§	
VS.	§	Preliminary Hearing on Motion
DEREK LAYNE MILLS	§	for Relief from Automatic Stay:
	§	10/26/2023 @ 9:30 a.m.
Respondent.	§	

**DEBTOR'S ANSWER AND OBJECTION TO
MOTION FOR RELIEF FROM AUTOMATIC STAY
FILED BY TORE AND DARLENE WIKSVEEN**

TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:

COMES NOW **MILLS, DEREK LAYNE** ("Debtor" whether singular or plural) and requests of the Court that a hearing be scheduled on the subject matter and files this Debtor's Answer and Objection to Motion for Relief from Automatic Stay Filed by **TORE AND DARLENE WIKSVEEN** ("Movant"), and in support hereof would respectfully show the Court as follows:

ELEMENT OF DEBTOR'S DEFENSE

1. There exists cause justifying the denial of Movant's Motion and requested action for the following reasons:

A. The property is necessary for the effective reorganization of the Debtor because it is the Debtor's residence.

B. Debtor would show the Court that adequate protection is being paid by paying the arrears through Debtor's Chapter 13 Plan of reorganization.

C. Debtor would show that the subject property is adequately insured to the extent necessary, proper, and sufficient to protect Movant's interest in the collateral.

D. Debtor would show the Court that any default may be cured within a reasonable time.

E. Debtor's Counsel will contact the Opposing Counsel to resolve this matter with an Agreed Order prior to the hearing date.

RIGHT TO AMEND OR SUPPLEMENT RESERVED

2. Debtor reserves the right to amend or supplement this Answer with additional information supported by Debtor's evidence, affidavit and/or amended answer.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Debtor prays that a hearing be set in the instant matter, that Movant's Motion be denied in all respects and that the automatic stay pursuant to §362 of the United States Bankruptcy Code remain in full force and effect, and for such other and further relief to which the Debtor may show himself entitled.

ALLMAND LAW FIRM, PLLC

/s/ Chris D. Anderson

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 10, 2023, a true and correct copy of the foregoing was served on all parties in interest below.

DEBTOR(S):

Mills, Derek Layne
2111 Portwood Way
Fort Worth, TX 76179

OPPOSING COUNSEL

Clayton L. Everett
515 E. Border Street
Arlington, Texas 76010

TRUSTEE:

Tim Truman
6851 N.E. Loop 820, Suite 300
North Richland Hills, TX 76180

/s/ Chris D. Anderson

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